

ORIGINAL

Approved:

CHRISTOPHER D. BRUMWELL
Assistant United States Attorney

Before: THE HONORABLE PAUL E. DAVISON
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA

: COMPLAINT

- v. -

: Violations of
18 U.S.C. §§ 922(g)(1)
and 2; 21 U.S.C. §
841(b)(1)(C)

PATRICK WILLIAMS,

Defendant.

: COUNTY OF OFFENSE:
WESTCHESTER

19m6454

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SOUTHERN DISTRICT OF NEW YORK, ss.:

Robert Lombardi, being duly sworn, deposes and says that he is a Task Force Officer with the Federal Bureau of Investigation, and charges as follows:

COUNT ONE

1. On or about July 11, 2019, in the Southern District of New York, PATRICK WILLIAMS, the defendant, knowing that he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly and intentionally did possess, in and affecting commerce, ammunition and a firearm, to wit: seven .40 caliber bullets manufactured by Winchester, which were loaded in a Taurus PT-140 .40 caliber pistol (the "Taurus PT-140"); the ammunition and firearm having been previously shipped and transported in interstate and foreign commerce.

COUNT TWO

2. On or about July 11, 2019, in the Southern District of New York, PATRICK WILLIAMS, the defendant, knowing that he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly and intentionally did possess, in and affecting

commerce, ammunition and a firearm, to wit: four .45 caliber bullets manufactured by Hornady, which were loaded in a Springfield Armory XDS .45 caliber pistol (the "Springfield Armory XDS"); the ammunition and firearm having been previously shipped and transported in interstate and foreign commerce.

(Title 18, United States Code, Sections 922(g)(1) and 2.)

COUNT THREE

3. On or about July 11, 2019, in the Southern District of New York, PATRICK WILLIAMS, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance.

4. The controlled substance that PATRICK WILLIAMS, the defendant, distributed and possessed with intent to distribute contained a detectable amount of MDMA, in violation of 21 U.S.C. § 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C).)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

5. I am an Investigator with the New York State Troopers and a Task Force Officer with the FBI Violent Crime/Safe Streets Task Force (the "Task Force"), and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement agents, as well as my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part.

6. Based on conversations with another member of the New York State Troopers, I know that:

a. On or about July 11, 2019 at approximately 1:30 AM, two members of the New York State Troopers ("Trooper-1" and "Trooper-2") were stationed on

State Route 9 in the vicinity of the village of Croton-Hudson.

- b. Trooper-1 and Trooper-2 observed a black Dodge Journey, New York license plate number HRZ4163 (the "Black Dodge") and another car traveling in excess of the speed limit.
- c. Trooper-1 and Trooper-2 attempted to stop the Black Dodge and the other vehicle, but the Black Dodge sped away.
- d. Trooper-1 and Trooper-2 followed the Black Dodge through State Route 9, the City of Peekskill, and the Town of Cortlandt.
- e. During the chase, the Black Dodge crashed into the car driven by Trooper-1 and Trooper-2 twice in the Town of Cortlandt. After the second collision, the driver of the Black Dodge got out of the car and put his hands up in the air.
- f. Trooper-1 and Trooper-2 placed the driver under arrest and searched the Black Dodge. Trooper-1 and Trooper-2 did not see any other person inside the Black Dodge.
- g. During the search of the Black Dodge, Trooper-1 and Trooper-2 found the Taurus PT-140 and the Springfield Armory XDS under the driver's seat.
- h. Trooper-1 and Trooper-2 also found approximately seven grams of a substance that field tested positive as MDMA in the center console of the Black Dodge.
- i. After being placed under arrest, the driver stated that his name was Patrick Williams, and that his date of birth is September 13, 1987. He also stated that he resides at 95 Weirfield Street in Brooklyn, New York.

7. On or about July 11, 2019, I reviewed biographical information and a photograph of PATRICK WILLIAMS, the defendant, in a database maintained by law enforcement. This database identifies WILLIAMS' date of birth as September 13, 1987, and identifies his address as 95 Weirfield Street in

Brooklyn, New York. Also, I personally observed the driver of the Black Dodge in the Town of Cortlandt after he was arrested, and his appearance matches the appearance of the photograph of WILLIAMS in the database I review. Therefore, I believe that the driver of the Black Dodge is WILLIAMS.

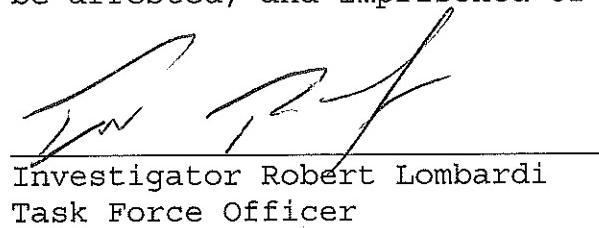
8. As part of my investigation of this matter, I have been informed by an agent ("Agent-1") of the United States Bureau of Alcohol, Tobacco and Firearms ("ATF"), which has data on the manufacturing of ammunition and firearms, that the rounds of ammunition discovered in the Black Dodge, as well as the Taurus PT-140 and Springfield Armory XDS, were not manufactured in the State of New York.

9. I have personally examined the Taurus PT-140, and observed that the serial number on the back strap of the gun has been filed down. The serial number of the Taurus PT-140 in the lower receiver of the gun, however, was not defaced. Based on my conversation with Agent-1, I know Agent-1 traced the Taurus PT-140 based on its serial number, and determined that it was stolen earlier this year in South Carolina.

10. Based on my training and experience, I know that seven grams of MDMA is a quantity that is consistent with distribution rather than personal use.

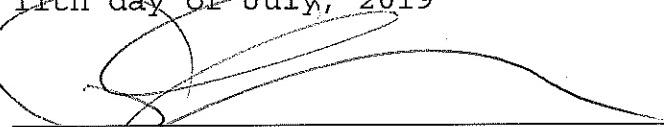
11. I have reviewed criminal history records pertaining to PATRICK WILLIAMS, the defendant, and learned that WILLIAMS was convicted on or about April 18, 2012, in Kings County Supreme Court, of criminal sale of a firearm in the second degree, in a violation of New York Penal Code Section 265.12(2), which is a felony punishable by imprisonment for more than one year. Based on my review of the criminal history records, I am aware that WILLIAMS was sentenced to four years' imprisonment, and incarcerated from on or about May 17, 2012 to November 24, 2014.

WHEREFORE, deponent respectfully requests that PATRICK WILLIAMS, the defendant, be arrested, and imprisoned or bailed, as the case may be.



Investigator Robert Lombardi
Task Force Officer

Sworn to before me this
11th day of July, 2019



THE HONORABLE PAUL E. DAVISON
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK